

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO
BE PERMITTED TO TRAVEL OUT OF STATE**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to travel out of the state of Arizona from March 10, 2006 to March 26, 2006. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.
2. Mr. Reid would like to travel to Oregon from March 10, 2006 to March 26, 2006 to assist his daughter, Delilah, who was involved in a serious motor vehicle accident approximately three months ago. While in Oregon, Mr. Reid will also be providing business services for Dormer's Screenprinting.
3. Undersigned counsel contacted Assistant United States Attorney General James Braun on March 1, 2006 and he stated that he has no objection to Mr. Reid's request.

4. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Sandra Avila Toledo, on March 6, 2006 and she stated she has no objection to Mr. Reid's request.

5. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Suzette Frisby, on March 1, 2006 and she stated that she has no objection to Mr. Reid's request so long as he calls her before his departure and upon his arrival.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to travel to Oregon from March 10, 2006 to March 26, 2006.

RESPECTFULLY SUBMITTED this 1st day of March, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
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I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 1st day of March, 2006.

/s/ electronically signed

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